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TO: 9-NPRM-CMTS at ARM

Subject: Type procedures for changed products

Requiring STCs to meet current FAR requirements rather than the FAR requirements existant at the time the original aircraft was manufactured would appear to have disadvantages which far outweigh any possible advantages gained.

First, this suggests that there was some limitation in the original design which an STC can now "patch". The AD system appears to address this quite adequately.

Second, even relatively simple changes often interact with other aircraft systems. Some design baseline must exist against which changes are made. If the existing baseline is against a previous set of standards, it may be very difficult to make changes which meet a new standard without updating other portions of the aircraft to the new standard. Changes can snowball under these circumstances, and a relatively simple change can become neeedlessly complex.

If existing aircraft have some design defficiency, they are usually the subject of a suitable AD. Requiring changes solely for the sake of being current increases complexity and cost without significant gains.

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